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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JOHN DOE,
Plaintiff,

v.

JIA LUN SHAO a/k/a ANDY SHAO and
JINGYUN WANG a/k/a VIVIAN WANG

Defendants.

Case No. 2:24-cv-09972

DECLARATION OF JOHN DOE

I, John Doe, being of full age, hereby declare:

1. I am the Plaintiff in the above-captioned case. I submit this Declaration in further support of my request to proceed under the pseudonym “John Doe[.]”

2. I cannot overstate the damage Defendants have already done to my life. As previously sworn, I was placed on leave during the investigation and missed on many opportunities during that time.

3. The reason I was placed on leave was so my employer could investigate the allegations contained in the harassing e-mails Defendants were anonymously sending individuals associated with my employer.

4. The lawsuit I filed contains even more e-mails Defendants were sending to me, my girlfriend, and Miss X as well as to Miss X's school and prospective employer. Between the new information and the fact that Defendants will be disseminating their lies to a worldwide audience rather than a finite mailing list, I have reason to believe it would result in me again being placed on leave by my employer while they investigate.

5. More leave means more and different missed opportunities, more and different clients asking why I have suddenly disappeared, and more and different colleagues speculating whether I am going to be terminated.

6. Worse yet, I fear that the public's access to this docket will lead to an even more severe reaction from my employer – potentially even termination – not because there is any truth to the allegations, but for the sake of public perception.

7. I know Defendants' claims are false and Defendants themselves have admitted they were unfounded so I cannot help but think that such a result would be tremendously unfair. Nevertheless, my termination is a potential (perhaps even probable) result if I am forced to name myself.

8. While Defendants wish this Court to believe they will behave civilly on this docket and not use it as a weapon, their behavior after being sued demonstrates otherwise. Shortly after my attorneys filed this lawsuit they called me in the dead of night to inform me that they had received a phone call from a Bloomberg reporter who wanted confirmation of my name and my employer. The reporter admitted he had received my name and information from Defendant Wang. Despite Defendant Wang's attempt to expose my identity with the reporter and tie my name to her and her husband's lies, I decided to seek justice within the confines of the court and refused to engage with the reporter.

9. The fact that defendants were figuring out a way to circumvent the protections of the pseudonym motion within hours of the lawsuit being filed should not come as a surprise to anyone – but it speaks volumes. Defendants were relentless in their harassment and them calling a reporter in the blink of an eye shows they have no plans to change their tactics.

10. That the reporter declined to write a story about the lawsuit altogether, to me, is a clear testimony to a lack of perceived public interest in the allegations and the instant case.

11. Defendants want this Court to believe that the damage to my name is already done and that putting my name on the public docket and/or them having

news stories written about me will not hurt me any worse. Respectfully, that is simply not the case.

12. Indeed, Defendants messaged dozens of people with their claims but, with any luck, some of the people on their mailing list did not open their e-mail; presumably some accounts marked it as spam. Regardless, the e-mails were directed to a large but limited audience.

13. There would be no such limitation if my name were added to this caption. Instead, Defendants would broadcast their past and inevitable new falsities on the worldwide web, my name would get fed into Google, and whenever anyone searched me online I will be an alleged rapist. My employer and people around me may also take Defendants' words in legal filings in a court docket more seriously, even if they remain baseless.

14. This hardly seems fair, given Defendants have already admitted their allegations are unfounded.

15. Knowing that my family would see these false allegations and these lies would follow me until long after my death is devastating. That potential employers, colleagues, and clients will see this when they search my name is likely career-ending. Defendants sending these false allegations to a finite audience is one thing, but to put them online forever? That is a whole different level and type of pain. I cannot begin to estimate how much it would multiply my damages. This is

especially devastating to me because Defendants' lies include (1) inflammatory sexual crime allegations and (2) topics which are of utmost intimacy to me personally such as my mental state, sexual history and habits, birth control, and family planning.

16. Stress from Defendants' past harassment already led me to seek medical help for stress-induced insomnia, kept me up at night, and put me in constant fear of losing my entire livelihood and everything I have worked so hard to achieve should the Defendants get what they want. The constant harassment and knowledge that the Defendants went as far as to send a person to meet me and try to harm me has also put me in fear for my safety. Indeed, when the emails were received, I was put under such severe mental distress and fear that I felt compelled to report the incident to local law enforcement in Hong Kong.

17. I am no one. I am not a public figure, I do not have a public persona. I work at a financial institution. While I have worked hard to climb the professional ranks, I would hardly consider myself to be in a position of much power. No one is protected by my name being used – Defendants have already admitted their claims were unfounded. The only ones who gain anything by me being forced to use my true name are Defendants.

18. Defendants seem to take issue with the qualifying language I used with regard to whether I would proceed with this lawsuit if forced to do so using my true name. To this I can only say that Defendants' appetite for inflicting pain on their

enemies terrifies me and I genuinely do not know if I have the strength to willingly subject myself and those around me to further harassment. While I wish I could say I will fight them no matter what, the truth is I need a job, I need the goodwill of clients and my employer, and I need and value my relationships with people Defendants have a history of attacking.

19. If made to include my true name in this caption, I would need to have long conversations with my employer and loved ones to discuss whether I would be pursuing justice at the cost of my job and relationships.

20. As to the matter of the pre-action discovery, I feel a few things are relevant here. At the time, I decided on the approach of not requesting anonymity because I must avoid a more protracted litigation process in order to (1) quickly preserve and obtain data that could otherwise be lost or deleted and (2) seek more immediate relief from what was an actively expanding campaign of harassment at the time. That said, I made other substantial efforts to protect my identity from the full extent of Defendants' attacks. Initially, the filed documents in that case do not include the totality of Defendants' harassment against me. Drafting those documents was incredibly difficult as I went back and forth with my lawyers to agree on what words to include that would be enough to warrant my receipt of the information without forever linking my name to the more heinous allegations. I purposefully did not include copies of all of the heinous statements that were being made by the

Defendants. Final content of documents in the pre-action lawsuit was deliberately vague compared to what has been set forth in this lawsuit.

21. The truth is, I have kept the Defendants' various false allegations against me and all their related harassment as well as my filing of this lawsuit as private as possible. This is partially because I do not wish to give legs to their lies about highly intimate, sensitive and/or inflammatory matters, but also because even thinking about their relentless torment brings me immense stress to this day.

22. I pray that this Court recognizes that, if my identity is unmasked, the continued, increased, and/or future severe harm to my career, reputation, relationships and personal well-being is not speculative; it is certain.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 30, 2024
Hong Kong SAR, PRC

J.D.
JOHN DOE